

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

-against-

DECLARATION

22-CRIM-425 (VEC)

CHINWENDU ALISIGWE

Defendant

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ANDREW B. STOLL declares, pursuant to 28 U.S.C. §1746, that the following is true and correct:

1. I am counsel to Defendant Chinwendu Alisigwe. I make this Declaration in support of my application to be relieved.

2. I have discussed this intention with Mr. Alisigwe and do not know whether he consents. I have spoken with the AUSAs on this matter who take no position on my application.

3. My client has refused to meaningfully cooperate with me in this litigation; his conduct has made my representation unreasonably difficult, our communication has broken down, and I can no longer provide him with effective representation as a result.

4. I make no further requests concerning assignment of counsel or adjournment of the current trial date, because I do not want to make any applications on behalf of my client that he may oppose.

5. I assert no lien on the matter.

6. Suppression hearings are currently scheduled for September 21, 2023, and trial on the original indictment, which has recently been superceded with an indictment adding a count of

money laundering and extending the time period of the crimes alleged, was scheduled for November 6.

7. Although I advised Mr. Alisigwe of my intention to make this application, I have not yet served this Declaration and the accompanying Notice of Motion on him; I will do so in Court on August 22 when we appear for his arraignment on the Superseding Indictment.



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Andrew B. Stoll  
August 21, 2023